

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et al.</i>	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
Debtors.	)	
	)	
	)	Hearing Date: Only if Timely Objections Are Made
	)	Objection Deadline: February 18, 2002 at 4:00 p.m.

**NOTICE OF APPLICATION**

TO: Counsel to the Debtors	Counsel to the Debtors' Post-Petition Lenders
Office of the United States Trustee	All parties requesting notice under Bankruptcy Rule 2002
Counsel to the Official Committee Of Unsecured Creditors	The Official Committee Of Asbestos Personal Injury Claimants

PLEASE TAKE NOTICE that, on January 29, 2002, the Official Committee of Property Damage Claimants of W.R. Grace & Co., Inc. and its affiliated debtors and debtors in possession (the "PD Committee") filed the attached **Application For Order Pursuant To Sections 1103(a) and 328(a) of the Bankruptcy Code and Fed. R. Bankr. P. 2014 and 2016 Authorizing The Retention and Employment Of W. D. Hilton, Jr. and As A Consultant To The Official Committee of Property Damage Claimants** (the "Application"). The Application seeks the entry of an Order authorizing the retention of W. D. Hilton, Jr. ("Hilton") as a consultant to the PD Committee.

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Application must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, and filed with the United States Bankruptcy Court, 824 N. Market Street, 5th Floor, Wilmington, Delaware 19801, on or before **February 18, 2002**.

PLEASE TAKE FURTHER NOTICE that responses, if any, must also be served so as to be **received no later than 4:00 p.m. on February 18, 2002** by the following: (a) the undersigned counsel for the PD Committee; (b) counsel for the Debtors (i) James H.M. Sprayregen, Esq., Kirkland & Ellis, 200 East Randolph Drive, Chicago, IL 60601 and (ii) Laura Davis Jones, Esq., Pachulski, Stang, Ziehl, Young & Jones, 919 North Market Street, 16th Floor, Wilmington, DE 19899-8705s, Esq.; and (c) Office of the United

States Trustee, 601 Walnut Street, Suite 950 West, Philadelphia, PA 19106, Attn: Frank Perch, Esq.

PLEASE TAKE NOTICE THAT ONLY IF OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE AFOREMENTIONED PROCEDURE, OR THE COURT OTHERWISE REQUESTS, WILL A HEARING TO CONSIDER THE APPLICATION BE HELD BEFORE THE HONORABLE JUDITH K. FITZGERALD, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, WILMINGTON, DELAWARE 19801 **ON A DATE TO BE DETERMINED** .

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: Wilmington, Delaware  
January 29, 2002

Bilzin Sumberg Dunn Baena Price &  
Axelrod LLP  
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and

Ferry & Joseph, P.A.  
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By: /s/Theodore J. Tacconelli  
Theodore J. Tacconelli, Esq.

COUNSEL FOR THE OFFICIAL COMMITTEE OF  
ASBESTOS PROPERTY DAMAGE CLAIMANTS